

EXHIBIT 267

Curling, Donna v. Raffensperger, Brad

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 DONNA CURLING, et al.,
5 Plaintiffs,

CIVIL ACTION FILE

6 vs.

NO. 1:17-cv-2989-AT

7 BRAD RAFFENSPERGER, et al.,
8 Defendants.

9
10 30(b)(6) VIDEO DEPOSITION of the COALITION FOR GOOD
11 GOVERNANCE, INC. through MARILYN MARKS
12 March 17, 2022

13 11:01 a.m.

14 TAKEN BY REMOTE VIDEOCONFERENCE
15 Robyn Bosworth, RPR, CRR, CRC, CCR-B-2138
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1 A I have two questions about your question.
2 Are you asking me how much of their seven days a
3 week is devoted to the case itself as opposed to
4 other CGG activities or --

5 Q I'm not. Let me ask the question a
6 different way.

7 A All right.

8 Q So in terms of the activities that the
9 volunteers are engaged in as part of their work as
10 volunteers for CGG, do you have an estimate of the
11 percentage of that time that is devoted to the
12 Curling case?

13 A This is just going to be a wild guess.
14 I'm going to say that probably 50 percent of it
15 would be related to the case. Probably 30 percent
16 of it would be related to other Dominion Voting
17 System and audit issues that are not in direct
18 support of the litigation, and the remainder on
19 other types of election administration activities.

20 For example, as you probably know we often
21 go to -- haven't had a chance to do this recently --
22 State Election Board with proposed rules about
23 election administration. Some of them would be BMD
24 related; many of them would not.

25 We didn't make it yesterday. We had plans

1 to promote some rules that we wish they would
2 promulgate having to do with canvassing, and we
3 didn't get them pulled together in time to submit to
4 the board.

5 Q So just kind of fleshing out a little bit,
6 so the kind of 20 percent of other types of
7 election-related activities, is that focused
8 primarily on advocacy for things the Coalition would
9 like to see in Georgia elections?

10 A That would be -- yes, that would -- it
11 would be primarily that or answering questions.

12 Our members tell me that they're hearing a
13 lot from candidates right now with questions about
14 everything from how to -- how do the BMDs really
15 work; can I really count on them; what should I have
16 for poll watchers.

17 So there's -- you know, do you consider
18 that a real formal education program, no, but we're
19 kind of here to try to answer questions that have to
20 do with the BMD system, the Dominion system, and
21 other related election activities. A lot -- we get
22 a lot of questions about poll watchers.

23 Oh, the other thing that we are working on
24 that we are getting a lot of questions about right
25 now is House Bill 1464 which includes ballots as

1 public records which we initiate -- we helped
2 initiate that. And then there are, I'm sure you
3 probably know, security chain of custody issues in
4 that bill as well as poll watcher regulations in
5 that bill, and we've been getting a lot and fielding
6 a lot of questions about that and been asked to
7 prepare some amendments.

8 So that -- and you can't really divide it
9 up into exactly where does that cross over into BMD,
10 how much percentage of time did you spend talking
11 about the BMD portion versus more generally poll
12 watchers.

13 Q Thank you. That's helpful.

14 I'm going to move next to the 990s. Is
15 this a -- do you want to take a break at this point,
16 Ms. Marks, or anybody?

17 A I'm fine. Up to you guys.

18 MR. TYSON: Rob, are you good?

19 MR. MCGUIRE: It might be good to take a
20 break if you think you're going to go for a while.

21 MR. TYSON: Yeah, it is going to be a
22 little while on the 990s, so take 5, 10 minutes?

23 MR. MCGUIRE: Yeah, can we, please?

24 MR. TYSON: Yeah, how long you want?

25 MR. MCGUIRE: Five is fine.

1 identification.)

2 BY MR. TYSON:

3 Q Do you see -- this is another Twitter
4 thread from your MarilynRMarks1 account?

5 A Yes. Does this have a date on it?

6 Q This is January 1, 2021.

7 A Okay. All right.

8 Q And what I'm trying to get to is someone
9 responded and said South Carolina and Kentucky are
10 the states that should be audited, and you said:
11 South Carolina is like Georgia. It uses unauditable
12 BMD touchscreen machines. We can never ever know
13 who won in South Carolina or Georgia because of the
14 use of those machines in the polling places.

15 A Correct.

16 Q You see that?

17 A I do.

18 Q Do you agree with that statement?

19 A I do.

20 Q Is CGG's contention that we can never
21 know -- is it -- sorry, let me start over again.

22 Is it CGG's contention that we cannot know
23 who won in Georgia because of the use of Dominion
24 BMDs in the polling places?

25 A Yes. And when we say "who won," what I

1 mean by that, and, of course, you know working with
2 a short Twitter message is hard to get all the
3 nuances in, but when I say "who won," what we mean
4 by that is we do not know who the voters voted for,
5 and that's what we mean by who won. We do not know
6 who the majority or the plurality of the voters
7 voted for in Georgia.

8 Q So it is CGG's contention then that it is
9 impossible to know whether more voters intended to
10 vote for Joe Biden than Donald Trump -- I'm sorry,
11 reverse of that. It is CGG's contention that it's
12 impossible to know whether more voters attempted to
13 vote for Donald Trump in the November 2020 election
14 in the state of Georgia than voted for Joe Biden,
15 correct?

16 A Well, that's true for any of the
17 candidates, including Biden, Trump, Jorgensen, that
18 that is correct that -- and that's what we've been
19 saying since before these BMDs were purchased long
20 before the 2020 election.

21 Q And so it's also the case then --
22 actually, let me ask this: Is it CGG's contention
23 that individuals who question the outcome of the
24 November 2020 election have a reasonable basis for
25 doing so?

1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF FULTON:

4 I hereby certify that the foregoing
5 transcript was taken down, as stated in the caption,
6 and the colloquies, questions and answers were
7 reduced to typewriting under my direction; that the
8 transcript is a true and correct record of the
9 evidence given upon said proceeding.

10 I further certify that I am not a relative
11 or employee or attorney of any party, nor am I
12 financially interested in the outcome of this
13 action.

14 I have no relationship of interest in this
15 matter which would disqualify me from maintaining my
16 obligation of impartiality in compliance with the
17 Code of Professional Ethics.

18 I have no direct contract with any party
19 in this action and my compensation is based solely
20 on the terms of my subcontractor agreement.

21 Nothing in the arrangements made for this
22 proceeding impacts my absolute commitment to serve
23 all parties as an impartial officer of the court.

24 This the 4th day of April, 2022.

25 

ROBYN BOSWORTH, RPR, CRR, CRC, CCR-B-2138